

**BEAVER CREEK
MOUNTAIN IMPROVEMENTS PROJECT
FINAL ENVIRONMENTAL IMPACT STATEMENT**

**VOLUME 2
RECORD OF DECISION
RESPONSE TO COMMENTS**

May 2012



**USDA Forest Service
White River National Forest
Eagle/Holy Cross Ranger District**

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Record of Decision

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MAY 2012

USDA FOREST SERVICE
ROCKY MOUNTAIN REGION (R2)
WHITE RIVER NATIONAL FOREST
EAGLE / HOLY CROSS RANGER DISTRICT

EAGLE COUNTY, COLORADO

Lead Agency: USDA Forest Service

Responsible Official: Scott Fitzwilliams, Forest Supervisor
White River National Forest

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1. INTRODUCTION

This Record of Decision (ROD) documents my decision to approve selected projects within Beaver Creek's 3,849-acre Special Use Permit (SUP) boundary on the White River National Forest (WRNF) in Eagle County, Colorado. My decision is based on, and supported by, the Beaver Creek Mountain Improvements Project Final Environmental Impact Statement (FEIS) and the administrative record.

BACKGROUND

Beaver Creek operates under a Forest Service SUP issued to Beaver Creek Associates (a subsidiary of Vail Associates, Inc.). The 40-year SUP covers approximately 3,849 acres of the WRNF, and was reissued in November 1999. The terms of the SUP require Beaver Creek to submit a Master Development Plan (MDP) to the WRNF, which identifies goals and opportunities for future management of the ski area on National Forest System (NFS) lands. Accordingly, Beaver Creek submitted an update to its MDP to the WRNF which was accepted in October, 2010. All of the individual elements of the Beaver Creek Mountain Improvements Project analyzed in the Draft and Final EIS documents are identified in the 2010 MDP.

Beaver Creek is home to the *Birds of Prey* racecourse, on which it hosts men's World Cup Downhill, Super G, Giant Slalom, and Slalom events. As the only current venue in the United States for men's World Cup races, and due to the quality of design and challenge of the course, the *Birds of Prey* has become one of the favorite stops on the men's World Cup circuit and is recognized as one of the premier racecourses in the world. That being said, Beaver Creek does not currently have women's Downhill or Giant Slalom racecourses.

In 2010, Fédération Internationale de Ski/International Ski Federation (FIS) awarded Vail/Beaver Creek the opportunity to host the upcoming 2015 World Alpine Ski Championships, which are held every two years—each time at a different venue. Beaver Creek and Vail Mountain hosted the 1989 and 1999 World Alpine Ski Championships, and Beaver Creek has maintained continued involvement in the World Cup race circuit ever since; however, neither mountain currently has the terrain which will accommodate the FIS requirements for separate venues for men's and women's Alpine events. This absence currently precludes Beaver Creek from hosting some international Alpine events.

A proposal was submitted to the WRNF in October, 2010 to construct new ski trail segments to accommodate a women's Downhill course, modify the existing men's course, modify *Ravens Ridge* trail to accommodate a women's Giant Slalom course, install new and upgraded snowmaking infrastructure, install a new domestic water storage tank, reconstruct Red Tail Camp, expand the existing TV compound and widen the utility corridor and relocate and upgrade utilities. The proposal was accepted and a National Environmental Policy Act (NEPA) review was initiated. It was determined that an

Environmental Impact Statement was appropriate based on the potential collective impacts across one or more resources.

LOCATION

Beaver Creek is located on the Eagle/Holy Cross Ranger District of the WRNF, approximately 100 miles west of Denver. The resort is accessed from the Front Range communities of Denver, Boulder, Fort Collins, and Colorado Springs via Interstate 70. The Town of Avon is located at the base of the resort and the Eagle County Regional Airport is located approximately 20 miles to the west.

PURPOSE AND NEED

Consistent with management direction in the WRNF's 2002 Land and Resource Management Plan (Forest Plan) and Beaver Creek's 2010 MDP Update, the purpose of the action is to:

- Update mountain facilities and infrastructure in order to provide the highest quality guest experience possible;
- Update mountain facilities and infrastructure related to ski racing to continue to provide world class venues for Alpine events; and
- Update guest services across the resort to respond to the needs and demands of Beaver Creek's market.

In order for Beaver Creek to continue to host international Alpine race events (including, but not limited to the 2015 World Alpine Ski Championships) and provide the highest quality experience for large numbers of racers and spectators, a number of trail and infrastructure projects are necessary. The following needs are consistent with the goals identified in Beaver Creek's 2010 MDP Update:

1. Improve upon/expand terrain to meet International Ski Federation (FIS) requirements for both men's and women's Alpine race events.
2. Provide a racecourse finish area that meets FIS requirements for larger Alpine race events.
3. Improve on-mountain guest services to accommodate the general public throughout the year and during Alpine race events.
4. Respond to key infrastructural deficiencies related to race storage, water delivery and wastewater.

Please refer to Chapter 1 of the Final EIS for the Purpose and Need in its entirety.

2. THE DECISION AND RATIONALE FOR THE DECISION

After thoroughly considering the project Purpose and Need, issues, alternatives and analyses presented in the 2012 Beaver Creek Mountain Improvements Project Final EIS, as well as the public and agency comments submitted, my decision is to approve Alternative 2 – the Proposed Action. With the exception

of overlap onto private lands owned by Beaver Creek Associates (a wholly owned subsidiary of Vail Resorts, Inc.), all of the projects approved by my decision are on NFS lands within Beaver Creek's existing 3,849-acre SUP boundary, which is designated as Management Area 8.25 in the WRNF's Forest Plan.

Further information is provided in the *Decision Rationale* section of this ROD.

THE SELECTED ALTERNATIVE

The Selected Alternative provides Beaver Creek with the authorization to implement key components of the 2010 MDP which will allow the ski area to host larger international Alpine racing events—including the upcoming 2015 World Alpine Ski Championships. Implementation of the projects in the Selected Alternative will also respond to long-term goals and objectives of the 2010 MDP Update.

Each component of the Selected Alternative specifically addresses the project Purpose and Need or responds to public issues/concerns raised during the scoping period. The Selected Alternative is depicted on Figure ROD-1.

All of the approved projects are within Beaver Creek's SUP area (with the exception of a proposed sewer line that extends north of the SUP area and the utility lines to Beano's and the water tank, both of which cross private land) and are within its existing lift/terrain network.

Birds of Prey Women's Downhill Course

Under the Selected Alternative a new women's Downhill racecourse is approved to be constructed within the Birds of Prey pod, utilizing two existing trails—*Flattops* and *Peregrine*—and two new trail segments. Approximately 4.6 acres of grading and 15.6 acres of tree removal/grading will occur to construct the new women's Downhill racecourse. To improve early season and lean snow year conditions, and to provide consistent snow coverage for racing events, new and upgraded snowmaking infrastructure will be installed on the entire length of the women's Downhill course.

Construction of the Birds of Prey Women's Downhill Course addresses Need #1.

Grouse Mountain Women's Giant Slalom Course

The women's Giant Slalom racecourse will be constructed on Grouse Mountain, and will utilize *Raven Ridge*, lower *Golden Eagle*, and a short new section of connector trail. Approximately 0.6 acre of grading and 1.7 acres of tree removal/grading will occur on the women's Giant Slalom racecourse. Snowmaking infrastructure is approved to be upgraded on *Raven Ridge* to ensure sufficient snowmaking coverage, and new infrastructure is approved in the connector trail.

Construction of the Grouse Mountain Women's Giant Slalom Course addresses Need #1.

Birds of Prey Men's Downhill Course

The Selected Alternative accommodates resolution of technical issues on the existing men's *Birds of Prey* racecourse by approving widening of the trail above *Westfall Road* and re-grading portions of the course at specific points along *Zoom Room* and *Golden Eagle*. The grading will reduce the amount of snow that is necessary to prepare the *Birds of Prey* racecourse in compliance with FIS standards. These projects entail approximately 10 acres of grading and 0.8 acre of tree removal/grading.

Grading and widening the Birds of Prey Men's Downhill Course addresses Need #1.

Spectator Access

The safety nets necessary for the new women's Downhill racecourse will render the existing spectator access route to the men's *Birds of Prey* racecourse unusable. Therefore, under the Selected Alternative a new trail will be constructed from *Goshawk* to *Peregrine* (immediately downhill of the existing spectator access trail) to enable event spectators descending from the Cinch Express to reach the middle portion of both the men's and women's Downhill racecourses. This will entail approximately 1.3 acres of disturbance and tree removal.

In addition, skier access to Red Tail Camp during Alpine racing events will be enhanced through the approval to widen the existing utility corridor between the *Dally* catwalk and Red Tail Camp to improve skier/rider circulation when visitors descend from the top of the Centennial Express (this will entail approximately 2.2. acres of disturbance).

Spectator access improvements address Need #3.

Red Tail Camp/Racecourse Finish Area

The entire Red Tail Camp area is approved to be re-graded and re-configured to accommodate a larger finish area that can be used for men's and women's Alpine racing events. The new area will be able to accommodate a spectator stadium for between 10,000 and 12,000 people. In addition, the existing Red Tail Camp guest service facility is approved to be removed and replaced with a larger building (approximately 25,000 square feet). Building design and approval is subject to the WRNF Building Design Review Process and will meet FS Built Environment Image Guidelines. Finally, the TV compound is approved to be expanded by approximately 75 percent to accommodate current and future media needs associated with Alpine racing events.

Relocation of existing utilities serving the Red Tail Camp area is approved, as is culverting an approximately 150-foot long stretch of Westfall Creek that runs through the Red Tail Camp area. Also, an existing culverted portion of Westfall Creek is approved for replacement and realignment in the Red Tail Camp area.

Re-grading and re-configuration of the Red Tail Camp area addresses Need #2.

Infrastructure Projects

The following infrastructure projects are approved to meet Beaver Creek's existing and future operational needs related to Alpine ski racing and general mountain operations:

Race Storage

- A new 24 x 36-foot storage facility west of the top terminal of the Birds of Prey Express to accommodate storage for existing and future Alpine race events. The building will need to meet FS Built Environment Image Guidelines.

Water Tank

- A new 150,000-gallon water tank and pump station on the edge of *Paint Brush*, adjacent the *Beaver Creek Expressway*. The water tank will provide additional potable water for the larger Red Tail Camp facility, as well as water for fire suppression and an enhanced distribution system. As per PDF identified in Table 2-1 of the Final EIS, the water tank will need to meet Forest Service Handbook/Manual policy for color and reflectivity.

Utilities

- A new 2,900-foot water line from the new 150,000-gallon water tank to the existing water line in the Red Tail Camp area.
- An upgrade of the 1,400-foot existing 4-inch domestic water line between Beano's Cabin and Red Tail Camp to an 8-inch water line.
- Replacement of approximately 3,000 feet of existing sewer line from Red Tail Camp down *Dally*.

These projects entail approximately 8 acres of grading and 0.5 acre of tree removal/grading.

These infrastructure projects address Needs #2 and #3.

DECISION RATIONALE

Implementation of the Selected Alternative will meet the Purpose and Need for Action by improving and expanding FIS-sanctioned terrain and on-mountain guest services at Beaver Creek, as well as responding to infrastructural deficiencies.

Beaver Creek occupies a unique position in the U.S. ski industry, providing the only FIS-sanctioned men's Alpine racecourse in the nation. Their desire to continually improve as they host annual World Cup Alpine racing events, as well as other large events, exemplifies a cultural, financial and operational commitment to the Alpine racing circuit that distinguishes it from many other resorts. This is consistent with the WRNF's 2002 Forest Plan (including Management Area 8.25), Beaver Creek's SUP, and the resort's 2010 MDP Update.

Due to its existing infrastructure and history with Alpine ski racing, Beaver Creek is well poised to host large events. The approved projects are within Beaver Creek's developed lift and terrain network, and I find that they offer a tremendous value to the recreational and Alpine ski racing community with commensurately few associated resource impacts. With only two exceptions, the Draft EIS comment period elicited supportive comments for the project in general, and individual project elements, specifically. With implementation of the Project Design Features included in Table 2-1 of the Draft and Final EIS, the project will be in compliance with existing laws, regulations and policies, as well as the Forest Plan standards and guidelines. In addition, issues raised by the Interdisciplinary Team have been addressed through project planning and Project Design Features; in order to minimize resource impacts.

While selection of Alternative 1 would have accommodated Beaver Creek's annual hosting of the FIS-sanctioned men's World Cup Alpine racing events, the United States would continue to lack an equally appropriate venue for hosting similar women's Alpine racing events. In addition, key infrastructural upgrades including the new Red Tail Camp guest service facility and area utilities would continue to be undersized and poorly located.

In reaching my decision, I carefully considered the Purpose and Need for Action; the goals and priorities outlined in the accepted 2010 MDP Update; the administrative record; existing laws, regulations and policies; feedback from the Interdisciplinary Team; public comments; and resource analyses presented in the Draft and Final EIS documents. Ultimately, my decision to approve these projects was strongly influenced by the overwhelmingly beneficial recreational and economic attributes with correspondingly few negative impacts to the biological and human environment (as documented throughout the Draft and Final EIS documents).

3. PUBLIC INVOLVEMENT

On December 3, 2010 a scoping package was mailed to community residents, interested individuals, public agencies, and other organizations. The scoping package provided a brief description of the Proposed Action, the Purpose and Need for Action, and an illustrative map. This information was specifically designed to elicit comments, concerns, and issues pertaining to the Proposed Action. A legal notice was published in the *Glenwood Post Independent*, and a Notice of Intent (NOI) to prepare an EIS was published in the *Federal Register*, on December 14, 2010. A public open house was held on January 6, 2011, at the Avon Public Library. In addition, the scoping package was posted on the WRNF website.

Based on the 41 letters received during scoping, a comment disposition was completed, which documents the Forest Service ID Team's categorization of each substantive comment. The comment disposition was prepared to identify issues and the formulation of potential alternatives to the Proposed Action. The issues are specifically addressed in Chapter 3 – Affected Environment and Environmental Consequences, of the Draft and Final EIS.

The Draft EIS was released for a 45-day comment period on November 25, 2011. The Forest Service received 29 letters during the comment period—24 in support, 2 in opposition, 1 neutral and 2 from federal agencies (Environmental Protection Agency and US Fish and Wildlife Service). Substantive comments provided on the Draft EIS are formally responded to in the Response to Comments.

4. REQUIRED PROJECT DESIGN FEATURES AND BEST MANAGEMENT PRACTICES

In order to minimize or avoid potential impacts to the human and biological environment, my decision to approve Alternative 2 hereby incorporates all Project Design Features and Best Management Practices included in Table 2-1 of the Final EIS. In addition, the following measure has been designed to minimize traffic associated with the 2015 World Alpine Ski Championships. This was articulated in the Biological Assessment, and the Final EIS has been updated to include it, as well.

“To minimize traffic contributions directly related to the 2015 World Alpine Ski Championships and reduce vehicle trips through the lynx linkage areas, additional measures will be developed in coordination with Beaver Creek Resort to promote strategies to reduce vehicle use. This may include the availability of additional vans or buses owned and operated by Vail Resorts, Inc. By utilizing available resources to promote the use of regional transportation for employees, volunteers, and guests, a tangible reduction in the number of daily vehicle trips and an increase in the average vehicle occupancy (AVO) rate can be achieved. This Traffic Volume Minimization Plan focuses on the utilization of mass transportation, namely the Colorado Mountain Express (CME) shuttle service, as a means of quantifiably reducing the 2015 World Alpine Ski Championship’s traffic contributions to I-70. The result will be reduced, event-related traffic volumes on regional highways that will further reduce potential adverse effects to lynx and other wildlife present during winter in those highway corridors.”

5. CONSIDERATION OF OTHER ALTERNATIVES

NEPA requires that a range of reasonable alternatives to the Proposed Action be developed and analyzed. By definition, alternatives must meet the Purpose and Need for the Proposed Action while responding to issues identified during scoping.¹ Therefore, in response to internal and external scoping, the Forest Service Interdisciplinary (ID) Team considered issues that would generate alternatives to the Proposed Action. Both CEQ Regulations and Forest Service Handbook direction emphasize that alternatives must meet the “reasonableness” criteria in order to warrant detailed analysis.

One alternative to the Proposed Action was considered by the ID Team. This alternative would have minimized impacts to soils, hydrology, wetlands and botany on proposed racecourse trails by allowing

¹ FSH 1909.15, Chapter 10, Section 12.33 and 14

flush cutting of stumps as opposed to stumping/smoothing. This alternative concept was eliminated due to concerns related to operation/safety issues associated with retention of stumps on racecourses.

I am confident that the ID Team considered a reasonable range of alternatives early in the NEPA process, and that the two alternatives analyzed in the Final EIS are adequate for the scope and scale of this project.

ALTERNATIVE 1 – NO ACTION

As required by NEPA, a No Action Alternative was included in this analysis for review alongside the action alternative.² The No Action Alternative reflects a continuation of existing management practices without changes, additions, or upgrades. Under the No Action Alternative, Beaver Creek would continue to host the only men’s World Cup skiing event in the United States. Due to a lack of suitable terrain to host the women’s Downhill, Giant Slalom or Super G, it would not be possible for Beaver Creek to host women’s events.

Red Tail Camp would continue to provide guest services at the finish area of the *Birds of Prey* racecourse, although spectator capacity would continue to be limited to approximately 4,000 visitors. In addition, the Red Tail Camp guest service facility would continue to be undersized for existing use, providing approximately 475 seats. The existing TV/Media compound located on the southwestern portion of Red Tail Camp would not be expanded under the No Action Alternative. Although adequate water is currently available for existing on-mountain guest service facilities, new codes could require additional water for fire flows in the future.

6. ENVIRONMENTALLY PREFERABLE ALTERNATIVE

In accordance with CEQ regulations, I am required to identify the alternative or alternatives that could be considered environmentally preferable (40 CFR 1505.2[b]). Forest policy (FSH 1909.15, Section 05) defines “environmentally preferable” as:

“An alternative that best meets the goals of Section 101 of NEPA... Ordinarily this is the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historic, cultural and natural resources.”

Based on the review of the alternatives, Alternative 1—the No Action Alternative—is the environmentally preferable alternative. Alternative 1 is identified as the environmentally preferable alternative because, by its nature, it is not accompanied by any of the acknowledged impacts to the human or biological environment associated with Alternative 2.

² 40 CFR 1502.14(d)

7. FINDINGS REQUIRED BY LAWS, REGULATIONS AND AGENCY POLICY

This approval is consistent with the intent of the 2002 Forest Plan's long term goals and objectives.³ The project was designed in conformance with 2002 Forest Plan Forest-wide management direction and incorporates appropriate Forest Plan guidance for Developed Recreation Sites.

As Forest Supervisor for the White River National Forest, I am required to manage the Forest in accordance with applicable laws and regulations. This authority, which includes approval of ski area projects, is delegated to me through agency policy described in Forest Service Manual 1200. In reviewing the Final EIS, I have concluded that my decision is consistent with all relevant laws, regulations and requirements. This includes, but is not limited to:

- Americans with Disabilities Act (ADA) of 1990
- American Indian Religious Freedom Act of 1978
- Archaeological Resource Protection Act of 1978
- Clean Air Act of 1990, as amended
- Clean Water Act of 1977, as amended
- Endangered Species Act of 1973, as amended, including consultation resulting in a Biological Opinion signed April 27, 2012.
- Fish and Wildlife Coordination Act of 1934, as amended
- Forest and Rangeland Renewable Resources Planning Act of 1974
- Multiple-Use Sustained Yield Act of 1960
- National Environmental Policy Act of 1969, as amended
- National Forest Management Planning Act of 1976
- National Forest Ski Area Permit Act of 1986, as amended
- National Historic Preservation Act of 1966, as amended
- Organic Administration Act of 1897, as amended
- Protection of Wetlands Executive Order 11990

³ USDA Forest Service, 2002a

Three other permits, which are outside of the Forest Service's jurisdiction, will also be required before portions of the Selected Alternative may be implemented:

- Eagle County general construction permits
- Comply with Colorado Department of Public Health and Environment Stormwater Construction Activities Permit
- U.S. Army Corps of Engineers 404 Wetland permit

8. IMPLEMENTATION DATE

An administrative appeal period accompanies this decision (extending 45 days from when the legal notice is published in the *Glenwood Post Independent*). Barring any appeal(s) received on this decision, Beaver Creek may begin implementing approved projects 50 days from when the legal notice is published (45 days plus a mandatory five-day stay of implementation). If appeals are filed, implementation may occur on, but not before, the 15th business day following the date of the last appeal disposition.

9. APPEAL PROVISIONS AND IMPLEMENTATION DATE

This decision is subject to administrative review (appeal) pursuant to 36 CFR Part 215. All appeals, including attachments, must be filed within 45 days from the publication date of a legal notice of decision in the *Glenwood Post Independent*, the newspaper of record. Appeals and/or attachments received after the 45 day appeal period will not be considered. The publication date in the *Glenwood Post Independent* is the exclusive means for calculating the time to file an appeal. Those wishing to appeal this decision should not rely upon dates or timeframe information provided by any other source.

The appeal must be filed (regular mail, fax, email, hand-delivery, or express delivery) with the Appeal Deciding Officer at: USDA Forest Service, Rocky Mountain Region, 740 Simms, Golden, CO 80401; FAX: (303) 275-5134.

The office business hours for submitting hand-delivered appeals are: Monday through Friday 7:30 a.m. to 4:00 p.m., excluding holidays. Electronic appeals must be submitted in a format such as an email message, plain text (.txt), rich text format (.rtf), or Word (.doc) to appeals-rocky-mountain-regional-office@fs.fed.us. The appeal must include a physical mailing address and have an identifiable name attached or verification of identity will be required. A scanned signature may serve as verification on electronic appeals.

Individuals or organizations who submitted substantive comments during the comment period specified at 36 CFR 215.6 may appeal this decision. The Notice of Appeal must meet the appeal content requirements specified at 36 CFR 215.14. If no appeals are filed within the 45-day appeal period, implementation of the decision may occur on, but not before, five (5) business days after the close of the appeal filing period.

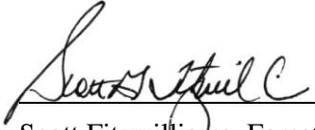
When appeals are filed, implementation may occur on, but not before, the 15th business day following the date of the last appeal disposition.

10. CONTACT PERSON

For additional information concerning this Record of Decision, the Final EIS, or the Forest Service appeal process, contact:

Don Dressler, Winter Sports Administrator
Eagle/Holy Cross Ranger District
PO Box 190
Minturn, Colorado 81645
(970) 827-5157

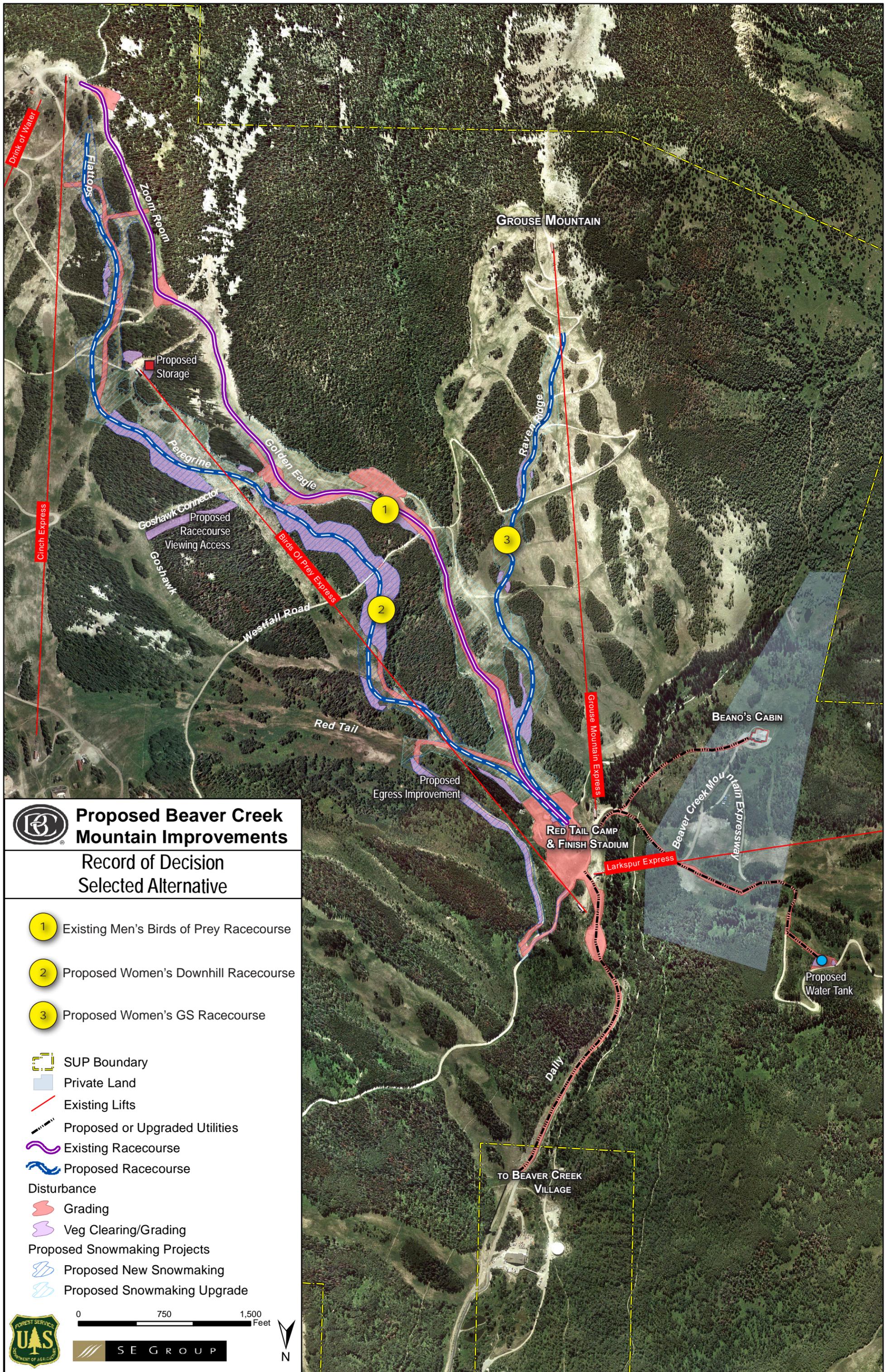
Responsible Official:



Scott Fitzwilliams, Forest Supervisor
White River National Forest

5/3/2012

Date



Proposed Beaver Creek Mountain Improvements

Record of Decision Selected Alternative

- 1 Existing Men's Birds of Prey Racecourse
- 2 Proposed Women's Downhill Racecourse
- 3 Proposed Women's GS Racecourse

- SUP Boundary
- Private Land
- Existing Lifts
- Proposed or Upgraded Utilities
- Existing Racecourse
- Proposed Racecourse
- Disturbance**
- Grading
- Veg Clearing/Grading
- Proposed Snowmaking Projects**
- Proposed New Snowmaking
- Proposed Snowmaking Upgrade



Response to Comments

RESPONSE TO COMMENTS RECEIVED ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

A Notice of Availability for the 2011 Beaver Creek Mountain Improvements Project Draft EIS was published in the Federal Register on November 25, 2011. The comment period on the Draft EIS extended through January 9, 2012 yielding 27 public and two agency comment letters—both oppositional and supportive.

All comment letters were reviewed for substantive comments, and contact information for each commentor was entered into a master database. These substantive comments provide the foundation for which this Response to Comments is based.

Depending on the resource or context, substantive comments were organized into 9 categories. Comments that resulted in an update to a particular component of the analysis between the Draft and Final EIS are indicated as such.

Names and affiliations of people who submitted comments on the Draft EIS are provided here. Per Forest Service Handbook 1909.15, Chapter 24.1(3), copies of comment letters received by tribes, federal, state and local agencies and elected officials are included.

Response to Comments

Suzanne Bohan Environmental Protection Agency
Robert Stewart US Department of the Interior
Barry Bryant
Benjamin Cooperman
Jonathan Corchnoy
DudleyDuel
RobertHamina
Dan Holman
Aaron Humphrey
Jack Jefferies
AllisonKent
Yuri Kostick
Mark Luzar
Scot Marana
Dominic Mauriello
Kyle Nelson
Jan Nordh
Steve Prawdzik
Scott Prince
Aldo Radamus
Pegasus Romaine
John Santaniello
Richard Sawyer
Richard Schnelle
James Smith
Jerry Sorensen
Heather Thomas
James Tombs

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1. RECREATION

- 1.1 *I hope that the improvements for 2015 will allow for greater course-side spectating of the races. As of now, access to view the races is virtually non-existent, except for pumphouse turn. I realize that grouse mtn. will be open at that time of year. That should help, but access from the eastern side of golden eagle needs to be improved.*

As discussed on page 3-9 of the Draft and Final EIS, the addition of both men's and women's racecourses within the Birds of Prey pod and on Grouse Mountain under Alternative 2 would increase options for spectators to view events on-course rather than being limited to existing mid-course locations or the finish area. Alternative 2 includes construction of a new access trail between *Goshawk, Peregrine and Golden Eagle* that would enable event spectators to reach the middle portion of the men's *Birds of Prey* racecourse and women's Downhill course. As noted, specific viewing areas have not been established at this time, but Beaver Creek is aware of the importance of this opportunity for spectators.

- 1.2 *Besides adding the Women's venue to Beaver Creek, the improvements to the existing men's course are needed. There will be tree removal and dirt/rock movement, but it appears to have no real cumulative negative effects. Currently I feel the public does need a better way to view the current men's course. The Goshawk Connector to the Pump House is very steep and in early winter has marginal snow coverage. It is very difficult for intermediate skiers to ski to Pump House. The area above Westfall road does need to be widened.*

Please refer to response to Comment 1.1 regarding the improvements to on-course spectating opportunities for the public.

- 1.3 *The DEIS relies on an assumption that spectators for the 2015 World Championships will follow Beaver Creek's "usual" visitation pattern of 80% destination visitors and 20% day visitors. Given the unusual nature of this international event, it is unclear whether this is a reasonable assumption. More daily vehicle trips could potentially result in more impacts to air, aquatic and wildlife resources. We recommend that the FEIS expand discussion on the USFS rationale that the 80% - 20% split for destination versus daily visits is a reasonable assumption related to the 2015 World Championships.*

Historically, Alpine racing events in the United States have been rare, and aside from the Lake Placid, Squaw Valley, and, more recently, the Salt Lake City Olympics, there are few events to use as direct comparisons. Therefore, the most logical events to use for estimating attendance at the 2015 World Alpine Ski Championships are the annual World Cup Alpine races that Beaver Creek hosts and the 1999 World Alpine Ski Championships hosted by Vail/Beaver Creek. The 80/20 ratio of destination to day visitor is based on information furnished by Vail Resorts, and the Forest Service accepts this assumption. The Vail Valley Partnership, which is the Chamber and Tourism Bureau for Eagle County, lists bed base surveys that demonstrate the capacity for destination based visitation that further supports this assumption.

- 1.4 ***Right now, it's rather difficult for folks with disabilities to get up to Red Tail Camp to view the races...It's quite an eye-opener how hard it is to access the stands at the finish area! Thanks to the ADA, people in America don't face those types of access problems. By regarding the Camp Red Tail area, it will be so much easier for folks who have limited mobility, not to mention folks with young children, to access the finish area and participate in the festivities.***

In addition to compliance with all applicable accessibility requirements, the reconstruction of Red Tail Camp provides an opportunity for enhanced access to these facilities for all users. The White River National Forest's Building Design Review Process specifically evaluates compliance with the Americans with Disabilities Act (ADA) and the Architectural Barriers Act Accessibility Guidelines (ABA).

2. WATERSHED

- 2.1 ***In addition to the water yield and stream health evaluations provided in the DEIS, we recommend the FEIS include a more thorough disclosure of baseline conditions given the numerous streams in, and downstream of, the project area.***

We understand the difficulty in providing water quality data for a large project area; however, such data would provide a baseline for future monitoring of impacts and evaluating of potential influence on downstream water quality. We recommend the FEIS provide a summary of available information and monitoring data on water quality for the project area, including water to be used for additional snowmaking and snowmelt receiving waters. Critical parameters to include are those of interest for any impaired waterbodies within or downstream of the project area.

Identification of any significant gaps in data may be helpful in developing the project monitoring plan. Given the special resource values of the area, we believe a water quality monitoring plan would be beneficial in efforts to achieve and/or maintain desired future conditions.

Pursuant to the 2002 Forest Plan, as amended, stream health management measures and design criteria are provided in the Region 2 Watershed Conservation Practices Handbook (WCPH) to ensure applicable Federal and State laws are met on NFS lands in Region 2. The WCPH contains several Management Measures (MM) of relevance regarding stream health and water resources effects. Necessarily, the Draft EIS relies on two key definitions within the Water Resources analysis: Stream Health and Stream Health Class. As such, stream health was considered for two reaches in the project area—Beaver Creek and Westfall Creek. Both of these reaches are described in detail in the Draft and Final EIS. Thus, the use of stream health is consistent with Forest Service regulations.

Further, as stated on pages 3-117 and 3-112, the projects within Alternative 2 would be consistent with the WCPH, including MM-3 which requires actions that occur within the water influence zone next to streams and lakes to maintain or improve long-term stream health and riparian ecosystem condition. Therefore, the Forest Service determined that the scope of the watershed analysis within 6,903 acres of the Westfall Creek and Upper Beaver Creek watersheds is appropriate for this analysis.

As indicated in the response provided for Comment 2.5, water to be used for additional snowmaking is within Beaver Creek's existing water rights adjudicated for a withdrawal rate of 12 cubic feet per second (cfs) from the Eagle River and an approved withdrawal rate of 7.5 cfs. Beaver Creek currently holds water rights that are more than adequate for the Proposed Action (see footnote 16, page 2-3).

See response to Comment 2.2 for a discussion of available information and monitoring data on water quality for the receiving streams.

2.2 *We recommend the FEIS include a discussion of any Clean Water Act (CWA) Section 303(d) impaired or threatened waterbody segments within, or downstream of: the project area. If there are none, then that should be so noted. The Colorado Department of Public Health and Environment (CDPHE) can identify/validate any such CWA Section 303(d) listed waterbodies potentially affected by the project. If CWA Section 303(d) listed waterbody segments occur within, or downstream of, the proposed project area, then we recommend that the FEIS describe how approval of the proposed project might affect these waterbodies, particularly the water quality parameters causing the CWA Section 303(d) listing. Proposed activities in the drainages of CWA impaired or threatened streams must be consistent with any Total Maximum Daily Load the State may have developed for the listed waterbody. We recommend that mitigation or restoration activities be included to reduce existing sources of pollution, and to offset or compensate for project impacts.*

Currently there are no 303d listed streams within or directly downstream of the Project Area. The Colorado Department of Health and Environment (CDPHE), Water Quality Control Commission (WQCC) added a 0.25-mile segment of Beaver Creek, extending from the confluence with Wayne Creek to the Eagle River, to the Monitoring and Evaluation (M&E) List for Aquatic Life Use in 2012 based on two conflicting samples, one indicating use attainment and the other impairment (Table 1).

An M&E List identifies water bodies where water quality problems are suspected, but there is uncertainty regarding one or more factors, such as the representative nature of the data. This segment of stream flows through private property that is developed for commercial use and is also affected by historic water diversion ditches and urban runoff. Samples collected in the Project Area indicate that the existing condition is meeting attainment for state aquatic life use.

Portions of the Eagle River in segment 9a downstream from the confluence with Beaver Creek were listed as impaired, under the CWA, Section 303(d), for sediment and temperature (Table 1). Three other Eagle River segments were added to the M&E List (Table 1) for temperature and sediment. The Eagle River experiences a multitude of anthropogenic disturbances from its headwaters to its confluence with the Colorado River including but not limited to, historic mining, residential and commercial development, highway systems, water diversions, and invasive species. The WQCC has not determined if, in fact, there is any impairment to any of these reaches with the exception of the sediment listing for the 2-mile section of the Eagle River from Berry Creek to Squaw Creek. A Total Maximum Daily Loads (TMDLs) for this section of the Eagle River has not been developed, and additional monitoring will be conducted over the next several years to evaluate the effectiveness of a recently completed stream restoration project.

Detailed analysis of the Proposed Action determined that there would not be a significant or measurable negative affect to stream health within the project area and would not likely contribute sediment in measurable levels to Beaver Creek or its affected tributaries. Therefore, it is not expected that the Proposed Action would have measurable negative effects on the M&E reach of Beaver Creek, the Eagle River or 303d listed portions of the Eagle River further downstream. Mitigation measures and BMPs are included in the Proposed Action to offset actions that would affect tributary stream habitat to Beaver Creek.

Table 1

Stream Name	Affected Portion	Monitoring & Evaluation Status	Clean Water Act Section 303 (d) Impairment	Year Listed	Miles from Project Area	Affected by Proposed Action
Beaver Creek	Confluence with Eagle River to Wayne Creek	Aquatic Life	N/A	2012	3.1	No measurable effect
Eagle River	From Berry Creek to Ute Creek	Temperature	N/A	2012	8	No measurable effect
Eagle River	From Ute Creek to Rube Creek		Temperature	2012	14.3	No measurable effect
Eagle River	From Berry Creek to Squaw Creek	Aquatic Life	Sediment	2012	8	No measurable effect
Eagle River	From Gore Creek to Berry Creek and from Squaw Creek to Rube Creek	Sediment	N/A	2012	3.4	No measurable effect

2.3 *Further, the proposed action would include installing a new water line, upgrading an existing water line and installing 3,000 feet of new sewer line, as well as expanding the snowmaking infrastructure. It appears that wetlands and riparian areas will be avoided by these projects; however, we recommend that the Final EIS (FEIS) disclose surface disturbance impacts to wetlands or riparian areas that would result from the proposed installation of these utility and snowmaking infrastructure upgrades, including: 1) location and amount of pipe proposed in wetlands and riparian areas (if applicable); 2) width and depth of the necessary trenches; 3) location on which the soil from the trench would be temporarily stored; and 4) amount of wetland soil compaction expected from related installation equipment.*

Chapter 3J – Wetlands, of the Draft and Final EIS discloses disturbance impacts to wetlands that would result from implementation of Alternative 2 (page 3-128). Specifically, the Proposed Action has been designed to avoid wetland impacts from installation of snowmaking infrastructure to the greatest extent practicable. Overstory vegetation removal would occur within 0.07 acre of wetland 4 and would convert a portion of the shrub wetlands (primarily willow) to herbaceous wetlands, therefore no permit would be necessary for this action. To minimize potential for ground disturbance in wetlands, known wetlands would be flagged prior to any construction activity.

The Draft and Final EIS discuss impacts to riparian areas in Chapter 3I – Water Resources. As discussed on page 3-113, implementation of Alternative 2 would result in the culverting of an approximately 150-foot section of Westfall Creek that runs through the Red Tail Camp area. The impact of this action would be mitigated through culvert removal and restoration of a 285-foot section of Westfall Creek, located roughly 1,700 feet upstream of the Red Tail Camp area.

2.4 *The DEIS provides well-reasoned project design criteria (PDCs) and Best Management Practices (BMPs) to minimize impacts to aquatic resources. However, we recommend a more thorough characterization of existing aquatic resources, including photographs to document baseline conditions in the proposed project area, as well as additional mitigation measures, where possible.*

The reader is referred to the response provided to Comment 2.1.

2.5 *The US Forest Service and National Ski Areas Association, of which Vail Resorts, operators of Beaver Creek Ski area, is a member, are currently “feuding” over the issue of snowmaking water rights. The USFS should not expand snowmaking at Beaver Creek (and other ski resorts operated on public lands) if the water may be lost at the whim of ski area operators. This issue must be resolved before any expansion of snowmaking operations is approved.*

This comment is beyond the scope of this analysis.

Currently Beaver Creek has water rights adjudicated for a withdrawal rate of 12 cubic feet per second (cfs) from the Eagle River and an approved withdrawal rate of 7.5 cfs. Beaver Creek currently holds water rights that are more than adequate for the Proposed Action (see footnote 16, page 2-3).

3. WILDLIFE AND AQUATIC SPECIES

3.1 *USFWS appreciates that the Forest Service, in its other activities, has accomplished measures for conservation of migratory birds described by the Memorandum of Understanding (#08-MU-1113-2400-264). They wish to see that progress continued with this project. However, the DEIS only suggests specific measures that “could be” implemented to minimize disturbance during the breeding season of migratory birds. We recommend that the Final EIS and associated decision record commit to implement the migratory bird conservation design criteria described in the DEIS for Alternative 2.*

The project design features listed under Alternative 2 (Table 2-1) allow for site specific mitigation of undesirable effects. The features were developed in consideration of the MOU to avoid direct mortality if nests are detected. If nests are not detected within the project area, then implementation would not be precluded unnecessarily.

3.2 *Habitat loss under Alternative 2 would incrementally reduce the carrying capacity for snowshoe hare (the lynx’ primary prey) and therefore for lynx. In addition, habitat removal would fragment larger habitat blocks, which may reduce lynx habitat connectivity and the effective value of remaining habitat. The Eagle Valley lynx analysis unit in which habitat losses from the proposed ski area project would occur is already impaired by the cumulative impact of the mountain pine beetle epidemic, such that large tracts of lodgepole*

pine forests that have supported lynx no longer meet Forest Plan Vegetation Standard 1. The USFWS recommends that the Final EIS specify commitments for mitigating the loss of lynx habitat.

Implementation of projects contained within the Proposed Action would occur in active ski terrain within the developed interior of the ski area. None of the intertrail tree islands that would be affected by the Proposed Action are effective as denning habitat or diurnal security habitat (DSH) because of ski area disturbances (during the ski season and during spring maintenance, coincident with denning periods), habitat fragmentation, and spatial, maternal, home range considerations. Alternative 2 would not result in increased skier use (i.e., skiing of closed areas, or backcountry skiing) of areas outside of currently skied areas that may be functional as denning habitat or DSH. Thus, Alternative 2 would not affect any currently effective denning habitat or DSH, nor would it necessitate mitigating for the loss of any of this habitat.

As identified on page 3-66 of the Draft and Final EIS: “while snowshoe hares associated with affected intertrail islands could adjust their home ranges to connect the functional large, remaining, high quality intertrail islands into a home range, there could nevertheless be some reduction in the local hare population, potentially impacting Lynx.”

The Biological Assessment that was prepared for this analysis and transmitted to the United States Fish and Wildlife Service for concurrence indicates that, to mitigate for lynx habitat loss, the Forest Service will explore Forest Health options and enhancements to improve habitat throughout the resort.

3.3 *The U.S. Fish and Wildlife Service (USFWS) is concerned that analyses of effects and the discussion of mitigation for threatened Canada lynx (*Lynx canadensis*) in Alternative 2 (the proposed action) do not meet the standards of the CEQ regulations. The DEIS explains that Alternative 2 would result in permanent loss of approximately 20 acres of lynx habitat in the ski area, but does not disclose whether or how destroyed lynx habitat would be mitigated.*

Please refer to the response provided for Comment 3.2.

3.4 *The DEIS identifies the Canada lynx, an Endangered Species Act (ESA)-listed threatened species, and the ESA-listed endangered Colorado River fish (humpback chub, Colorado pikeminnow, razorback sucker and bonytail) as likely to be adversely affected by the proposed project. Table 2-1, Project Design Criteria and Best Management Practices, contains measures to reduce impacts to these special status species; however, it is unclear how a commitment to promoting and implementing these measures will be ensured. We recognize that USFS will discuss these criteria and practices with the U.S. Fish and Wildlife Service (USFWS). Documentation of USFWS’s consultation and recommendations for PDCs, mitigation, and monitoring will be available in addition to the FEIS.*

As indicated on page 2-7 of the Draft and Final EIS, responsibility for ensuring that required PDF are implemented rests with Beaver Creek and the Forest Service. In all cases, the ultimate enforcement mechanism for implementation of the specified PDF would be the Record of Decision, and would extend from the Forest Supervisor to the District Ranger, to the Forest Service SUP Administrator.

- 3.5** *One area of the analysis that I found downright odd was the idea that this one event and the traffic associated therein could so adversely affect lynx migration across I-70. Do we need to do lynx studies for all special events, to and from all Colorado towns? I completely understand the sensitivity to lynx but I-70 is a high-traffic corridor designed to carry traffic.*

Additional traffic on Interstate 70 related to the 2015 World Alpine Ski Championships would be an indirect effect of the White River National Forest's approval to implement proposed projects. Therefore, per both NEPA and ESA, the Forest is required to analyze and disclose all potential impacts (including direct, indirect, and cumulative) to Canada lynx, which is listed as "threatened" under ESA.

- 3.6** *We encourage you to address systematic use of organized public transportation to minimize impacts that high-volumes of highway traffic have on wildlife, and to reduce other transportation-related impacts such as air quality, use of fossil fuels, green-house gas emissions, and parking space.*

The Draft and Final EIS discusses approaches to minimize traffic associated with the 2015 World Alpine Ski Championships (refer to Table 2-1 [Wildlife heading] and page 3-69). In addition, the Final EIS has been updated to include the following information from the Biological Assessment that was submitted to the U.S. Fish and Wildlife Service:

"To minimize traffic contributions directly related to the 2015 World Alpine Ski Championships and reduce vehicle trips through the lynx linkage areas, additional measures will be developed in coordination with Beaver Creek Resort to promote strategies to reduce vehicle use. This may include the availability of additional vans or buses owned and operated by Vail Resorts, Inc. By utilizing available resources to promote the use of regional transportation for employees, volunteers, and guests, a tangible reduction in the number of daily vehicle trips and an increase in the average vehicle occupancy (AVO) rate can be achieved. This Traffic Volume Minimization Plan focuses on the utilization of mass transportation, namely the Colorado Mountain Express (CME) shuttle service, as a means of quantifiably reducing the 2015 World Alpine Ski Championship's traffic contributions to I-70. The result will be reduced, event-related traffic volumes on regional highways that will further reduce potential adverse effects to lynx and other wildlife present during winter in those highway corridors."

4. TRAFFIC / PARKING / ACCESS

- 4.1** *We note that the Traffic, Parking and Ski Area Access analysis, beginning on p. 3-12, provides annual average daily traffic (AADT) and level of service (LOS) metrics for Beaver Creek's normal operations. However, no information is provided for AADT and LOS in relation to the 2015 World Championships' impacts on the pertinent I-70 intersections that service the Beaver Creek area. For the purpose of public disclosure, we recommend the FEIS contain an expanded analysis to specifically address the anticipated AADT and LOS levels and impacts that would result from implementation of the proposed project for the peak two-week timeframe of the 2015 World Championships.*

Based on the analysis presented in the Draft and Final EIS, the Forest Service is confident that, due to the finite extent (i.e., two weeks) of this event, associated traffic increases are not anticipated to measurably affect AADT at key points along I-70 (for reference, AADT at Dowds Junction has been calculated at 32,000; refer to Table 3B-1). As discussed on page 3-21, peak traffic volumes associated with the 2015 World Alpine Ski Championships would likely occur at the beginning of the event and on weekends, ebb during the middle of the event, then peak again immediately prior to and shortly after the competition has concluded. As such, the traffic effects related to the Proposed Action (which would enable Beaver Creek to host the 2015 World Alpine Ski Championships) would be short-term in nature and would cease to contribute to regional traffic volumes once the event has concluded. The Draft and Final EIS acknowledges that traffic associated with more popular days of racing (and on weekends) can be expected to be substantially higher and could significantly impact traffic flows. This is not unlike conditions associated with other large sporting events.

4.2 *The DEIS addresses the on-mountain expansion proposed but does not address the corresponding off-mountain impacts such as parking.*

Table 3B-5 of the Draft and Final EIS lists the existing parking capacity at public and employee parking lots at Beaver Creek. As discussed, on anticipated peak days throughout the season, including during the annual *Birds of Prey* World Cup event, the parking supply/demand imbalance is offset through the use of CDOT permits to park up to 150 cars on Highway 6. As discussed in the Draft and Final EIS on pages 3-19 to 3-22, Beaver Creek has been hosting Alpine ski racing events on an annual basis dating back to 1999, and is well equipped to host large events.

4.3 *The DEIS also discusses effects from the increased traffic volume anticipated for the 2015 World Alpine Skiing Championships at Beaver Creek Mountain. However, the DEIS does not clearly explain whether the Forest Service has the discretion and authority to require the applicant to mitigate these effects. We recommend that the Final EIS provide an explanation of the project components where the Forest Service retains discretionary authority so we can provide appropriate recommendations for avoiding, minimizing, and offsetting those effects.*

While the White River National Forest does not have jurisdiction off-site, project design features and best management practices (included in Table 2-1 of the Draft and Final EIS) that are designed to address/reduce traffic impacts will be incorporated into a Traffic Volume Minimization Plan. Refer to response for Comment 3.6.

5. MITIGATION / MONITORING / BMPS

5.1 *We support the PDCs and BMPs related to dust, construction equipment, on-site burning, traffic, and parking. To reduce impacts, we recommend consideration of the following additional measures: 1) Require reduced fee and/or frequent shuttle services for skiers, workers and event attendees; 2) Require extensive promotion of shuttle services, including regularly scheduled service to/from Denver and Eagle County airports and area lodging; 3) Prohibit unnecessary idling of construction equipment; and 4) Use low-sulfur or alternative fuels in construction vehicles.*

This comment is addressed point-by-point, below:

- Shuttle services are currently utilized and will continue to be regardless of events. The Transportation Committee of the World Alpine Ski Championships is tasked with providing efficient, reliable and available transportation related to this event.
- See response to Comment 3.6

Table 2-1 of the Final EIS includes a PDF that addresses minimization of equipment idling time and construction-related trips during implementation.

- A PDF requiring that construction vehicles will utilize low sulfur or alternative fuels during project implementation has been incorporated into Table 2-1 of Final EIS.

5.2 *Additional PDCs, such as measures to prevent drainage of adjacent wetlands from trench design (e.g., cutoff collars), may be beneficial.*

As indicated on page 3-128 of the Draft and Final EIS, the Proposed Action has been designed to avoid wetland impacts from installation of snowmaking infrastructure to the greatest extent possible. In addition to the four wetland-specific Project Design Features/Best Management Practices are included in Table 2-1, the following was added to the Final EIS: Construction and project design will preclude drainage of adjacent wetlands.

We suggest expanding the PDCs and BMPs to ensure that wetlands are protected to the greatest extent possible. Additional mitigation measures for consideration may include the following: 1) Re-vegetate with removed shrubs and mats of herbaceous cover (carefully stockpiled on-site) and appropriate high altitude wetland seed species as soon as possible after the disturbance. Monitor for five years to ensure successful re-vegetation of any impacted montane wetland areas, 2) Use bulkhead/box structures to minimize disturbance area from side casting and trench width, and 3) Use fabric or hay layers to protect existing vegetation from stockpiled dredged material and to mark existing contours.

In particular, we recommend additional mitigation measures for loss of wetlands functions from vegetation removal in Wetland #4. Willow plugging/revegetation in other areas in the watershed should be available to enhance vegetative and habitat functions lost through trail clearing activities. In addition, we support the proposed removal of culverted sections of Westfall Creek and recommend that the proposed culvert section be removed during summer months as practiced in other Vail Associates resorts with drainages located near base areas.

This comment is addressed point-by-point, below:

- Overstory vegetation removal within wetland 4 is proposed in order to provide more even terrain for the racecourse, therefore revegetation with shrubs would not be appropriate in this area. As identified in the Wetlands section of the Draft EIS, revegetation would occur with low growing, herbaceous species. A PDF requiring appropriate high altitude wetland seed species to be used to revegetate wetlands as soon as possible after the disturbance has been incorporated into Chapter 2 of the Final EIS.

- In regards to disturbance from side casting, the Draft and Final EIS includes PDFs that require placement of construction materials in upland areas, and ensure that they would not migrate toward wetlands and streams.
- Trench material is stored adjacent the trench in upland areas and backfilled replacing the lower layers at the bottom of the trench and the top layers on top. Generally, the grasses used to revegetate ski slopes can easily be covered and then cleared of dredged material. If any areas are identified to be protected, the area would be avoided or mats would be used.
- As suggested, by the commentor, wetland improvement elsewhere in the watershed within Beaver Creek Resort is beyond the scope of this analysis.
- Removal of the proposed culvert during the summer months would result in increased soil and vegetation impacts due to repeated, annual access inhibiting revegetation efforts.

6. TERRAIN

6.1 *I am supportive of the Beaver Creek improvements because the proposed on-mountain improvements have been designed to minimize environmental impact. All improvements are proposed as in-fill or in previously disturbed areas, and Beaver Creek is making maximum use of existing terrain and facilities. The improvements do not expand outside of the footprint of the Beav.*

Comment noted.

7. PURPOSE AND NEED

7.1 *The Replacement of the Red Tail Camp Restaurant is necessary to create an enhanced Race Finish Area and Media Center, as well as accommodate guest service needs, including the demand for more inside restaurant seating, well into the future.*

Comment noted.

7.2 *The stated purpose and need to develop women's race venues and improve men's race venues at Beaver Creek is both discriminatory and without merit. If as state as 1-4 of the DEIS, "FIS requires separate venues for men's and women's alpine events, which Beaver Creek currently does not offer", why were both men's and women's FIS sanctioned events being held at Beaver Creek when the DEIS was released in early December 2011?*

The Purpose and Need for Action is a subset of the goals and objectives identified in Beaver Creek's 2010 Master Development Plan Update. In 2010, the FIS awarded Vail/Beaver Creek the opportunity to host the upcoming 2015 World Alpine Ski Championships. However, as indicated on page 1-4 of the Draft and Final EIS, the FIS requires separate venues for men's and women's Alpine events, which Beaver Creek currently does not offer. The women's race hosted in December of 2011 as a result of low snow conditions in Europe was a Super G which utilized a portion of the existing men's course and would not meet the requirement of separate men's and women's venues. For a World Alpine Championship contest, men's and women's courses must be prepared simultaneously. The preparation and safety features

required for such races preclude the use of one venue. Furthermore, the existing men's Downhill course does not meet the specifications for a women's course.

7.3 *I oppose allowing these changes to Beaver Creek so that more natural land is gone. This profiteer can improve, but it should be on the site it presently has, not taking over additional open space that nature has. It is time to stop the continual taking and taking by profiteers to make money and leaving nothing natural or pure anymore.*

All proposed improvements at Beaver Creek fall within the 2002 Forest Plan Management Area 8.25 – Ski Areas (Existing and Potential), which directs:

“Facilities may be intensively used throughout the year to satisfy a variety of seasonal recreational demands... Protection of scenic values is emphasized through application of basic landscape aesthetics and design principles, integrated with forest management and development objectives... Transportation systems provide convenient access to National Forest System lands in key portal locations with adequate public parking, base facilities, and community infrastructure. Base areas that serve as entrance portals are designed as gateways to public lands. They are architecturally designed to blend with the forest setting and contain convenient facilities and services that provide for the needs of forest visitors.”¹

The Purpose and Need is consistent with the 2002 Forest Plan General Recreation Standards and Guidelines. The 2002 Forest Plan acknowledges an increasing demand for recreation on the WRNF, and states:

“Satisfy demand for recreation services that are supplied by private-sector permittees at authorized sites or areas before new sites or areas are permitted.”²

No improvements/expansion of ski area facilities outside of MA 8.25 are included in the Proposed Action.

8. AIR QUALITY

8.1 *In addition, we recommend the Mobile Source Air Toxics (MSATs) Regulations section be expanded to provide a more thorough public disclosure of the possible health concerns associated with the six prioritized MSATs. Such a disclosure would include toxicity information from the Weight of Evidence Characterization summaries in EPA's Integrated Risk Information System database, which represents our most current evaluations of the potential hazards and toxicology of these MSATs. See <http://www.epa.gov/iris/>.*

In the FEIS, Chapter 3E – Air Quality has been updated to include toxicity information for the six prioritized MSATs. The information included in the FEIS was taken verbatim from the IRIS database

¹ USDA Forest Service, 2002c p. 3-80

² USDA Forest Service, 2002a p. 2-31

Weight of Evidence Characterization summaries and represents the Agency's most current evaluations of the potential hazards and toxicology of these chemicals or mixtures.

As noted on page 3-43 of the Draft and Final EIS, the EPA has issued a number of regulations that will significantly decrease MSATs by requiring the use of cleaner fuels and cleaner engines.

- 8.2** *We note that Table 3E-1, National Ambient Air Quality Standards (NAAQS) for Criteria Pollutants, was prepared based on a May 28, 2010 access date to EPA's NAAQS web site. We recommend updating this table, particularly for sulfur dioxide, as there have been some changes since that time. See <http://www.epa.gov/air/criteria.html>.*

In the Final EIS, Table 3E-1 has been updated to include the most recent NAAQS for Criteria Pollutants from the EPA's NAAQS website.

- 8.3** *We note that the DEIS provides a qualitative discussion of existing ambient air quality in the area and identifies sensitive receptors, such as Eagle's Nest Wilderness Area (a Class I Federal area approximately 8 miles to the north) and Holy Cross Wilderness Area (a sensitive Class area approximately 2 miles to the south). To more fully characterize baseline conditions, we recommend that the FEIS include air quality trends at the nearby Class I area over the past several years. Such data are readily available from the Colorado Department of Public Health and Environment (CDPHE) and/or the EPA AirExplorer web site (<http://www.epa.gov/airexplorer/>). Information regarding current conditions will be an important tool for monitoring the impacts of future project activities.*

As noted on page 3-40 of the Draft and Final EIS, all activities will meet Forest Plan standards that require activities to comply with local, state, and federal air quality regulations and maintain conformity with the State Implementation Plan. The White River National Forest Air Resource Management Plan (January, 2009) assesses current air resource conditions and trends to assist in meeting this standard. Future project activities are beyond the scope of this analysis.

9. SOCIAL AND ECONOMIC RESOURCES

The following comments were submitted in support of the proposed action and are listed here in addition to the analysis found on pages 3-32 to 3-39 of the FEIS.

- 9.1** *In a low snow year like the one we're currently experiencing, we cannot stress enough the importance of Alpine ski racing and the attention the World Alpine Ski Championships brings to the entire Eagle River Valley; the economic benefits to our communities are very real – during the 1999 Championships, of the \$20 million spent in Colorado, \$16 million was spent in the Vail area.*
- 9.2** *This project is a great example of a public-private partnership that offers great potential benefits to our community. For a minimum of additional modification to the existing area, the returns in terms of positive exposure and economic gain for the USFS, Vail Resorts, and Colorado will be substantial. This is a win-win scenario for all involved.*
- 9.3** *The continuum of the 2015 World Championships begins with the preparation of the terrain to host, the local community synergy to welcome, and the athletes to WOW. The*

billion viewers expected to see our ski races in their living rooms with loved ones will hold lasting memories of our Resorts, Our Valley, Our State, Our Country and Our National Forest!

- 9.4 *Besides adding to some of the best parts of the ski area, the exposure of Colorado on the world stage is almost beyond measure. In Austria alone, the current races are watched by nearly 20% of their population, and the viewership in Europe during 2015 will be in the tens of millions. In addition, the work required to build the new trails will create jobs and boost the local economy.*

10. COMMENT LETTERS SUBMITTED BY FEDERAL AGENCIES

US Environmental Protection Agency

US Fish and Wildlife Service



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
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JAN 09 2012

Ref: 8EPR-N

Mr. Scott G. Fitzwilliams, Forest Supervisor
c/o Don Dressler
White River National Forest
P.O. Box 190
Minturn, CO 81645

RE: EPA Comments on Draft Environmental
Impact Statement, Beaver Creek Mountain
Improvement Project; CEQ #20110397

Dear Mr. Fitzwilliams:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the November 2011 Draft Environmental Impact Statement (DEIS) for the Beaver Creek Mountain Improvement Project. This DEIS was prepared by the Eagle/Holy Cross Ranger District of the U.S. Department of Agriculture Forest Service (USFS) White River National Forest to analyze potential environmental impacts associated with the proposed improvements to, and expansion of, terrain and finish areas to meet International Ski Federation requirements for alpine race events and to improve on-mountain guest services in preparation for hosting the 2015 International Ski Federation World Alpine Ski Championships (2015 World Championships).

Project Description and Background

The Beaver Creek Mountain Improvement Project Area is located in the White River National Forest at the Beaver Creek Resort, which is near the town of Avon in Eagle County, Colorado. Beaver Creek operates under a Forest Service Special Use Permit (SUP) issued to Beaver Creek Associates (a subsidiary of Vail Associates, Inc.). The proposed project includes improving/expanding terrain and racecourse finish areas for men's and women's alpine race events; improving on-mountain guest services to accommodate the public throughout the year and during race events; and responding to infrastructural deficiencies related to race storage, water delivery, and wastewater.

A summary of the two alternatives analyzed in detail in the DEIS follows.

- Alternative 1 (No Action) would be a continuation of existing management practices without changes, additions, or upgrades to existing conditions.
- Alternative 2 (Proposed Action) would result in temporary or permanent impacts to

approximately 52 acres in the Beaver Creek Resort SUP area, and would include the following:

- Race terrain projects, including construction of new women's downhill and giant slalom courses and improvements to the existing men's racecourse, along with the associated snowmaking infrastructure, connector and access trails;
- Racecourse finish area projects, including re-grading the entire Red Tail Camp finish area, replacing/realigning the culverted portion of Westfall Creek that runs through Red Tail Camp area and culverting a new 150-foot stretch of Westfall Creek, relocating existing utility lines, and expanding the media compound;
- Guest services projects, including relocating/replacing the Red Tail Camp with a larger building to increase capacity; and
- Infrastructure projects, including installing a storage facility, constructing a new 150,000 gallon water tank and pump station, installing a new water line, upgrading an existing water line, and installing 3,000 feet of new sewer line.

Key Issues Identified by EPA

In a January 27, 2011 letter, EPA provided scoping comments for this project. We appreciate that many of our scoping comments were addressed in the November 2011 DEIS; however, we do have remaining concerns related to disclosure and/or mitigation of project impacts to: (1) aquatic resources and (2) air quality. These concerns are the basis for EPA's "EC-2" rating discussed at the conclusion of this letter.

(1) Aquatic resources in the project area should be fully described and any impacts mitigated.

EPA considers protection of aquatic resources, including water quality, hydrology, wetlands, and riparian areas, to be among the most critical issues to be addressed in any NEPA analysis for projects in mountain areas where shorter growing seasons and low night time temperatures contribute to difficult mitigation of alpine impacts. Generally, the DEIS provides well-reasoned project design criteria (PDCs) and Best Management Practices (BMPs) to minimize impacts to aquatic resources. However, we recommend a more thorough characterization of existing aquatic resources, including photographs to document baseline conditions in the proposed project area, as well as additional mitigation measures, where possible, as discussed in more detail below.

Wetlands: We appreciate the inclusion of PDCs and BMPs to protect sensitive soils, wetlands, and riparian areas, and project design specifications to avoid and minimize impacts to wetlands wherever possible, as required by Executive Order 11990, Protection of Wetlands. We suggest expanding the PDCs and BMPs to ensure that wetlands are protected to the greatest extent possible. Additional mitigation measures for consideration may include the following:

- Re-vegetate with removed shrubs and mats of herbaceous cover (carefully stockpiled on-site) and appropriate high altitude wetland seed species as soon as possible after the disturbance. Monitor for five years to ensure successful re-vegetation of any impacted montane wetland areas.
- Use bulkheads/box structures to minimize disturbance area from side casting and trench width.
- Use fabric or hay layers to protect existing vegetation from stockpiled dredged material and to mark existing contours.

In particular, we recommend additional mitigation measures for loss of wetlands functions from vegetation removal in Wetland #4. Willow plugging/revegetation in other areas in the watershed should be available to enhance vegetative and habitat functions lost through trail clearing activities. In addition, we support the proposed removal of culverted sections of Westfall Creek and recommend that the proposed culvert section be removed during summer months as practiced in other Vail Associates resorts with drainages located near base areas.

Further, the proposed action would include installing a new water line, upgrading an existing water line and installing 3,000 feet of new sewer line, as well as expanding the snowmaking infrastructure. It appears that wetlands and riparian areas will be avoided by these projects; however, we recommend that the Final EIS (FEIS) disclose surface disturbance impacts to wetlands or riparian areas that would result from the proposed installation of these utility and snowmaking infrastructure upgrades, including:

- location and amount of pipe proposed in wetlands and riparian areas (if applicable);
- width and depth of the necessary trenches;
- location on which the soil from the trench would be temporarily stored; and
- amount of wetland soil compaction expected from related installation equipment.

Additional PDCs, such as measures to prevent drainage of adjacent wetlands from trench design (e.g., cutoff collars), may be beneficial.

Impaired Waterbodies: We recommend the FEIS include a discussion of any Clean Water Act (CWA) Section 303(d) impaired or threatened waterbody segments within, or downstream of, the project area. If there are none, then that should be so noted. The Colorado Department of Public Health and Environment (CDPHE) can identify/validate any such CWA Section 303(d) listed waterbodies potentially affected by the project. If CWA Section 303(d) listed waterbody segments occur within, or downstream of, the proposed project area, then we recommend that the FEIS describe how approval of the proposed project might affect these waterbodies, particularly the water quality parameters causing the CWA Section 303(d) listing. Proposed activities in the drainages of CWA impaired or threatened streams must be consistent with any Total Maximum Daily Load the State may have developed for the listed waterbody. We recommend that mitigation or restoration activities be included to reduce existing sources of pollution, and to offset or compensate for project impacts.

Water Quality Data: In addition to the water yield and stream health evaluations provided in the DEIS, we recommend the FEIS include a more thorough disclosure of baseline conditions given the numerous streams in, and downstream of, the project area. We understand the difficulty in providing water quality data for a large project area; however, such data would provide a baseline for future monitoring of impacts and evaluating of potential influence on downstream water quality. We recommend the FEIS provide a summary of available information and monitoring data on water quality for the project area, including water to be used for additional snowmaking and snowmelt receiving waters. Critical parameters to include are those of interest for any impaired waterbodies within or downstream of the project area. Identification of any significant gaps in data may be helpful in developing the project monitoring plan. Given the special resource values of the area, we believe a water quality monitoring plan would be beneficial in efforts to achieve and/or maintain desired future conditions.

(2) Air quality impacts from increased air emissions associated with the proposed project should be fully evaluated and disclosed.

The town of Avon and a mandatory Class I Federal area, Eagle's Nest Wilderness Area, are located near the proposed project area. In addition to health-based standards to protect ambient air quality, the Clean Air Act requires special protection of visibility in Class I Federal areas.

Applicable Regulations: We note that Table 3E-1, National Ambient Air Quality Standards (NAAQS) for Criteria Pollutants, was prepared based on a May 28, 2010 access date to EPA's NAAQS web site. We recommend updating this table, particularly for sulfur dioxide, as there have been some changes since that time. See <http://www.epa.gov/air/criteria.html>.

In addition, we recommend the Mobile Source Air Toxics (MSATs) Regulations section be expanded to provide a more thorough public disclosure of the possible health concerns associated with the six prioritized MSATs. Such a disclosure would include toxicity information from the Weight of Evidence Characterization summaries in EPA's Integrated Risk Information System database, which represents our most current evaluations of the potential hazards and toxicology of these MSATs. See <http://www.epa.gov/iris/>.

Baseline Data: We note that the DEIS provides a qualitative discussion of existing ambient air quality in the area and identifies sensitive receptors, such as Eagle's Nest Wilderness Area (a Class I Federal area approximately 8 miles to the north) and Holy Cross Wilderness Area (a sensitive Class II area approximately 2 miles to the south). To more fully characterize baseline conditions, we recommend that the FEIS include air quality trends at the nearby Class I area over the past several years. Such data are readily available from the Colorado Department of Public Health and Environment (CDPHE) and/or the EPA AirExplorer web site (<http://www.epa.gov/airexplorer/>). Information regarding current conditions will be an important tool for monitoring the impacts of future project activities.

Impacts: The DEIS notes that no long-term air quality impacts are expected as a result of the proposed project and short-term impacts from fugitive dust, construction equipment and on-site burning would be addressed through BMPs to minimize impacts. We note that the Traffic, Parking and Ski Area Access analysis, beginning on p. 3-12, provides annual average daily traffic (AADT) and level of service (LOS) metrics for Beaver Creek's normal operations. However, no information is provided for AADT and LOS in relation to the 2015 World Championships' impacts on the pertinent I-70 intersections that service the Beaver Creek area. For the purpose of public disclosure, we recommend the FEIS contain an expanded analysis to specifically address the anticipated AADT and LOS levels and impacts that would result from implementation of the proposed project for the peak two-week timeframe of the 2015 World Championships. For an example of public disclosure of this type of information, see Section 4.16, "Transportation and Traffic," of the Bureau of Land Management's "Over-The-River" project EIS (http://www.blm.gov/co/st/en/fo/rgfo/planning/otr/otr_final_eis/otr_final_eis_documents.html). Note the "Over-The-River" project is also designed for a two-week visitation period.

We support the PDCs and BMPs related to dust, construction equipment, on-site burning, traffic, and parking. To reduce impacts, we recommend consideration of the following additional measures:

- Require reduced fee and/or free shuttle services for skiers, workers and event attendees;

- Require extensive promotion of shuttle services, including regularly scheduled service to/from Denver and Eagle County airports and area lodging;
- Prohibit unnecessary idling of construction equipment;
- Use low-sulfur or alternative fuels in construction vehicles; and
- Monitor re-vegetation of disturbed areas for five years to ensure success.

Other Issues

Documentation of the U.S. Fish and Wildlife Service's recommendations will be a valuable addition to the FEIS.

The DEIS identifies the Canada lynx, an Endangered Species Act (ESA)-listed threatened species, and the ESA-listed endangered Colorado River fish (humpback chub, Colorado pikeminnow, razorback sucker and bonytail) as likely to be adversely affected by the proposed project. Table 2-1, Project Design Criteria and Best Management Practices, contains measures to reduce impacts to these special status species; however, it is unclear how a commitment to promoting and implementing these measures will be ensured. We recognize that USFS will discuss these criteria and practices with the U.S. Fish and Wildlife Service (USFWS). Documentation of USFWS's consultation and recommendations for PDCs, mitigation, and monitoring will be a valuable addition to the FEIS.

Assumptions regarding percentages of destination visitors versus day visitors must be adequately explained and justified given the associated implications for resource impacts.

The DEIS relies on an assumption that spectators for the 2015 World Championships will follow Beaver Creek's "usual" visitation pattern of 80% destination visitors and 20% day visitors. Given the unusual nature of this international event, it is unclear whether this is a reasonable assumption. More daily vehicle trips could potentially result in more impacts to air, aquatic and wildlife resources. We recommend that the FEIS expand discussion on the USFS rationale that the 80% - 20% split for destination versus daily visits is a reasonable assumption related to the 2015 World Championships.

EPA's Rating and Recommendation

Consistent with Section 309 of the CAA, it is EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, EPA is rating this DEIS as Environmental Concerns – Insufficient Information (EC-2). The "EC" rating indicates that EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. The "2" rating indicates that EPA has identified additional information, data, analyses, or discussion that we recommend for inclusion in the FEIS. A full description of EPA's rating system is enclosed.

We appreciate the opportunity to review and comment on this DEIS and hope that our comments will assist you in further disclosing and reducing the environmental impacts of this project. If we may provide further explanation of our comments, please contact me at 303-312-6925, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,



Per Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

Enclosure

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.



United States Department of the Interior



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December 23, 2011

9043.1
ER 11/1094

Scott Fitzwilliams
Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, Colorado 81602-0948

Dear Mr. Fitzwilliams:

The U.S. Department of the Interior has reviewed the Draft Environmental Impact Statement (DEIS) for the White River National Forest's Beaver Creek Mountain Improvements Project dated November 2011, and provides the following comments for your consideration.

GENERAL COMMENTS

The U.S. Fish and Wildlife Service (USFWS) is concerned that analyses of effects and the discussion of mitigation for threatened Canada lynx (*Lynx canadensis*) in Alternative 2 (the proposed action) do not meet the standards of the CEQ regulations.^{1,2} The DEIS explains that Alternative 2 would result in permanent loss of approximately 20 acres of lynx habitat in the ski area, but does not disclose whether or how destroyed lynx habitat would be mitigated.

Habitat loss under Alternative 2 would incrementally reduce the carrying capacity for snowshoe hare (the lynx' primary prey) and therefore for lynx. In addition, habitat removal would fragment larger habitat blocks, which may reduce lynx habitat connectivity and the effective value of remaining habitat. The Eagle Valley lynx analysis unit in which habitat losses from the proposed ski area project would occur is already impaired by the cumulative impact of the mountain pine beetle epidemic, such that large tracts of lodgepole pine forests that have supported lynx no longer meet Forest Plan Vegetation Standard 1. The USFWS recommends that the Final EIS specify commitments for mitigating the loss of lynx habitat.

The DEIS also discusses effects from the increased traffic volume anticipated for the 2015 World Alpine Skiing Championships at Beaver Creek Mountain. However, the DEIS does not clearly

¹ 40 CFR § 1502.14(f)

² 40 CFR § 1502.16(h)

explain whether the Forest Service has the discretion and authority to require the applicant to mitigate these effects. We recommend that the Final EIS provide an explanation of the project components where the Forest Service retains discretionary authority so we can provide appropriate recommendations for avoiding, minimizing, and offsetting those effects. In particular, we encourage you to address systematic use of organized public transportation to minimize impacts that high-volumes of highway traffic have on wildlife, and to reduce other transportation-related impacts such as air quality, use of fossil fuels, green-house gas emissions, and parking space.

Migratory Birds

USFWS appreciates that the Forest Service, in its other activities, has accomplished measures for conservation of migratory birds described by the Memorandum of Understanding (#08-MU-1113-2400-264). They wish to see that progress continued with this project. However, the DEIS only suggests specific measures that “could be” implemented to minimize disturbance during the breeding season of migratory birds. We recommend that the Final EIS and associated decision record commit to implement the migratory bird conservation design criteria described in the DEIS for Alternative 2.

Thank you for the opportunity to review and comment on the DEIS. If you have question regarding these comments, or for further assistance in project planning, please contact Kurt Broderdorp at the USFWS’ Western Colorado Ecological Services office at phone number (970) 243-2778, extension 24.

Sincerely,

A handwritten signature in black ink that reads "Robert F. Stewart". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Robert F. Stewart
Regional Environmental Officer

cc: Don Dressler